



## Babergh Development Framework

This Response Form relates to the

### Proposed Further 'Main Modifications' to the Babergh Core Strategy (May 2013)

#### Important Notes: please read before completing this Response Form:

- Representations must be specific and should only relate to the Schedule of Further Proposed Main Modifications and/or accompanying Sustainability Appraisal addendum.
- If you have previously submitted representations on any other part of the Core Strategy at either the Pre-Submission Stage (Oct 2011) or at the Proposed Modifications Stage (Summer 2012) you do not need to re-submit the same comments. The Inspector will already have taken these into account through the Examination process to date.
- All duly made (valid) representations will be passed on in full to the Inspector for his consideration. They will also be made publically available via the Babergh District Council website. Personal contact details will remain confidential. Babergh Council or the Inspector will not acknowledge, reply to, or give feedback on, your comments but the Inspector will consider him for his final report providing findings and recommendations
- Responses will automatically become invalid if they are received after the published deadline.
- Please use a separate Part 2 Form for each representation you wish to make.

**All comments must be received by 4.30pm on Tuesday 9<sup>th</sup> July 2013**

#### Representations can be made by:

- Completing this form electronically and submitting it by e-mail to [ldf@babergh.gov.uk](mailto:ldf@babergh.gov.uk) quoting "Further Mods Consultation" in the subject line of the e-mail, or
- Completing a paper copy of this form and submitting it by post to: Spatial Planning Policy Team, Babergh District Council, Corks Lane, Hadleigh, Suffolk, IP7 6SJ

The Proposed Further Main Modifications document and all other relevant supporting material can be viewed online via the Council's website at: [www.babergh.gov.uk/babergh/ldf](http://www.babergh.gov.uk/babergh/ldf)

Paper copies of the consultation documents will also be made available for inspection at the Council Offices, Corks Lane, Hadleigh, and at a number of public libraries across the district. See the Publication Notice document on the website for more details.

**Queries:** If you have any questions please contact us using the details given above or by calling us during normal office hours on (01473) 826678

**Rep No:**  
(Internal use only)

## Part 1: Personal Details

All respondents should complete Section A. If you are an Agent (acting and responding for a client) please also complete Section B

### Section A: Respondent Details

Title / Name: Sarah Keys

Job Title (if applicable): Parish Clerk

Organisation / Company (if applicable): Brantham Parish Council

Address:

15 Palfrey Heights  
Brantham

Postcode: CO11 1SE

Tel No: 07702 490212

E-mail: [branthamparishclerk@yahoo.co.uk](mailto:branthamparishclerk@yahoo.co.uk)

### Section B: Agents Details (Please complete details of the client / company you represent)

Name of client / organisation / company: Brantham Parish Council

Name / contact details of client / company: Sarah Keys (Parish Clerk)

Address:

15 Palfrey Heights  
Brantham

Postcode: CO11 1SE

Tel No: 07702 490212

E-mail: [branthamparishclerk@yahoo.co.uk](mailto:branthamparishclerk@yahoo.co.uk)

## Part 2: Representation(s)

Please complete a separate Part 2 form for each representation you wish to make

<b>Respondent Name / Organisation:</b>	<b>Brantham Parish Council</b>
<b>Agent Name / Organisation</b>	

<b>1. Which Main Modification does your representation relate to?</b>	<b>25</b>
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<b>2. Please specify whether you:</b>	
<b>SUPPORT</b> the further Main Modification – as this will assist in making the Core Strategy sound and/or legally compliant (please tick)	
<b>OBJECT</b> to the further Main Modification – because this will not assist in making the submitted Core Strategy sound and/or legally compliant (please tick)	✓

### 3. Please enter your full representation here:

Brantham Parish Council have long accepted the need to develop the Brantham Regeneration Area. A reasonable level of mixed development on this former industrial site is appropriate. Although remote from our main village life, it is an eyesore to all. Credit should be given for the remedial & demolition work already carried out. We do, however, question the desirability and need to expand the area to include residential development on Greenfield land. (Proviso D). This land would not normally be considered for such development on its own, as it lies outside the village envelope. The Prime Minister has recently spoken, indeed, on the need to preserve Greenfield land where Brownfield land is available.

It seems that the developer is using Babergh District Councils determination to see the original Brownfield site developed as leverage to allow this more profitable Greenfield development. This has been presented as a late addition to the Core Strategy to provide both viability and sustainability in difficult economic times. We believe the developer purchased this Proviso D land some years ago, in a separate transaction from the purchase of the original Factory Site, and with just this long term aim in mind. How advanced these plans actually were is indicated by the basis of the Ecological Survey carried out by the Landscape Partnership in September 2010, but not published until 2012. (Document J03 of the Core Strategy Library). This survey covers the full area, now included in Modification 25. There are multiple references to the various features of the envisaged development area matching those of the BDC/St Francis Groups Post Examination Submission Document L18, published in March 2013. Since these documents directly address the point of this modification we believe them to be relevant.

St Francis Group envisage a total number of houses for both sites of 600 (according to Document L18 of the examination evidence) 320 of which would be within the Greenfield area. Brantham currently has some 1000-1100 houses. 600 more would be an increase of over 50%. That cannot be said to be 'a level that is proportionate in scale to the existing village'. (Policy CS6a Proviso C). Nor is it 'capable of satisfactory assimilation' (Same Proviso). The possible 280 homes on the Brownfield site will be difficult enough to absorb, being an increase of 25%.

The developer says that this additional housing is necessary to make the overall redevelopment viable. It is worth pointing out that there are two strips of the original site on the North side of Factory Lane that had little or no factory development and that building on these could easily be both viable and profitable. As a company specialising in development of 'difficult' sites they are surely capable of finding ways to make a profit as originally intended. The village could probably live without the Proposed Open Space between Decoy Pond and the, already inadequate, sewage works, which should help reduce costs.

Policy CS6a also says that regard would be given to satisfactory improvements to, and with, the local road network, including vehicular access to the A137 in any application. Options have been taken on properties on Brooklands Road by the St Francis Group. The likely route, apart from Factory Lane itself, would have to be a connecting road to Brooklands Road and on a winding path through a built up area to join the A137 at an already difficult T junction. Further to this the traffic flow on the A137 itself is already subject to considerable bottlenecks at each end of the village, the railway crossing/underpass at Manningtree Station and the road narrowing viaduct at the Stutton end of the village. These may not be part of BDC's responsibility, but they should be strongly considered in this strategy. Again the extra housing on the Greenfield land would make this strategy unsound and potentially unsafe.

Under Implementation and Delivery we note that due to 'lead time issues' a specific phasing period is not considered necessary. If no phasing were allowed, what guarantees will BDC have that Brownfield & Greenfield development would take place at the same speed? A result that might see little or no development on the Factory site, but significant Greenfield housing, would surely fail to meet BDC's declared aims. BDC say that they would seek Guarantees in the Planning Process, but surely this should be included in the Core Strategy itself. As the 40 hectares of Brownfield land have already been available for sale and always could be, there seems to be a danger of a 'Trojan Horse' without some strategy provisions.

In the event of some Proviso D Greenfield development, which we wholeheartedly oppose, phasing should be included to ensure that the overall planning objective can be met.

We also wish to state that we are not satisfied with the level of engagement and consultation from both BDC and SFG. It has been neither 'constructive' nor 'proactive'. This Parish Council and the village we represent have been kept in the dark for far too long. This has been, in many ways, an undemocratic process that has taken little or no account of the most important stakeholders, the people of our Parish.

Housing is needed here as elsewhere, as is employment, but development should be proportionate to the size of a community. The 'impact on this existing landscape tract' (Brantham) will not be helped by the proposed mitigation and landscaping. The Policy, as modified, would improve one planning blight at the expense of creating another, far more reaching, one.

Proviso D, and all references to it, should be removed from the Strategy. Allowing it makes it impossible to comply with the rest of Policy CS6a and the whole Policy becomes nonsense.

*(Continue on a separate sheet if necessary)*

**4. If your representation is more than 100 words, please provide a short summary here (of no more than 100 words):**

Residential Development on the Proviso D land would result in a grossly disproportionate increase in the population and size of the village. The developer should be capable of a viable and profitable development without this Greenfield land as difficult Brownfield development and remediation is their declared speciality.

The road network, the A137 and the community itself could not absorb such an increase. The modification is not consistent with the rest of Policy CS6a and cannot be considered sound or sustainable. Proviso D and all references to it should be removed from the Core Strategy.

5. With reference to your comments above please specify what further change(s) you consider necessary to make the Core Strategy sound and/or legally compliant.

(Continue on a separate sheet if necessary)

6. With the inclusion of these further Main Modifications do you consider the Core Strategy document to be:

**Legally Compliant?** (Mark 'x')

Yes		No		Yes with my suggested change	X
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**Sound?** (Mark 'x')

Yes		No	X	Yes with my suggested change	
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7. If you consider the document is Unsound, please identify which soundness test(s) you think are failed? (Mark 'x')

<b>Positively Prepared:</b> <i>the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development</i>	X
<b>Justified:</b> <i>the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence</i>	X
<b>Effective:</b> <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities</i>	X
<b>Consistent with National Policy:</b> <i>the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework</i>	X

8. The Inspector will decide if a further public hearing session is required as part of the examination process. If this was the case, do you consider it necessary to participate at this, or deal with matters through written representations? (Mark 'x')

Request and appear at any additional oral Hearing	X	No, written representation only	
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**9. If you wish to request the Inspector to have an additional oral Hearing, please outline clearly why you consider this to be necessary in the space below:**

Large parts of this process have escaped public scrutiny. It has not been as transparent as it should have been. There are also issues of consultation with Suffolk County Council (Highways and Schools) and Tendring District Council (further housing development in the Parish of Lawford within 2 miles of this site). These have a considerable impact on the viability and sustainability of plans for the Brantham Regeneration Area and the village of Brantham as a whole.

*Note: The Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.*

I understand that my full representation will be considered by the Planning Inspectorate in line with this consultation and that my comments will be made publicly available and identifiable to my name and/or organisation. The information in this form is, to the best of my knowledge, correct.

<b>Signed:</b>	<b>Dated:</b>
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Thank you for taking the time to give us your views.

### Part 3: Sustainability Appraisal of Proposed Further Main Modifications

<b>Respondent Name / Organisation:</b>	
<b>Agent Name / Organisation</b>	

<b>Page No.</b>	<b>Paragraph Ref:</b>	<b>Comment</b> (please continue on a separate sheet if necessary, but summarise each of your comments if they are longer than 100 words)

<b>Signed:</b>	<b>Dated:</b>
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